

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP

SHAWN A. WILLIAMS (213113)
MONIQUE C. WINKLER (213031)
AELISH M. BAIG (201279)
100 Pine Street, Suite 2600
San Francisco, CA 94111
Telephone: 415/288-4545
415/288-4534 (fax)
swilliams@lerachlaw.com
moniquew@lerachlaw.com
abaig@lerachlaw.com

-and-

TRAVIS E. DOWNS III (148274)
BENNY C. GOODMAN III (211302)
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
travisd@lerachlaw.com
bgoodman@lerachlaw.com
-and-
THOMAS G. WILHELM (234980)
9601 Wilshire Blvd., Suite 510
Los Angeles, CA 90210
Telephone: 310/859-3100
310/278-2148 (fax)
twilhelm@lerachlaw.com

Co-Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re TRIDENT MICROSYSTEMS, INC.,
DERIVATIVE LITIGATION

This Document Relates To:
ALL ACTIONS.

E-filed 3/22/07

SCHIFFRIN BARROWAY TOPAZ
& KESSLER, LLP
ERIC L. ZAGAR
ROBIN WINCHESTER
JAMES A. MARO
280 King of Prussia Road
Radnor, PA 19087
Telephone: 610/667-7706
610/667-7056 (fax)
ezagar@sbtclaw.com
rwinchester@sbtclaw.com
jmaro@sbtclaw.com

) Master File No. C06-3440-JF

) STIPULATION AND ~~PROPOSED~~ ORDER
) CONTINUING CASE MANAGEMENT
) CONFERENCE AND SETTING HEARING
) DATE FOR NOMINAL DEFENDANT
) TRIDENT MICROSYSTEMS, INC.'S
) MOTION TO DISMISS

1 WHEREAS, lead plaintiffs filed their First Amended Consolidated Verified Shareholder
2 Derivative Complaint ('Amended Complaint') on March 7, 2007;

3 WHEREAS, pursuant to this Court's February 9, 2007 Order, nominal defendant Trident
4 Microsystems, Inc.'s ('Trident') response to the Amended Complaint will be due no later than April
5 16, 2007, and in the event that Trident responds by a motion to dismiss the Amended Complaint for
6 failure to plead that making a demand would have been futile (pursuant to Fed. R. Civ. P. 23.1), lead
7 plaintiffs shall file and serve their opposition within forty-five (45) days after service of Trident's
8 motion, and Trident shall file and serve a reply to lead plaintiffs' opposition within fifteen (15) days
9 after service of the opposition; and

10 WHEREAS, the parties have met and conferred and believe the interest of judicial economy
11 will be served by continuing the case management conference currently scheduled on March 23,
12 2007 at 10:30 a.m. to July 12, 2007 at 10:30 a.m., or as soon thereafter as the Court's calendar
13 permits, and setting the hearing on Trident's Motion to Dismiss for July 12, 2007 at 9:00 a.m., or as
14 soon thereafter as the Court's calendar permits.

15 THEREFORE IT IS STIPULATED AND AGREED that:

16 1. The case management conference scheduled on March 23, 2007 at 10:30 a.m. is
17 continued until July 12, 2007 at 10:30 a.m.

18 2. The hearing on Trident's Motion to Dismiss is set for July 12, 2007 at 9:00 a.m.

19 DATED: March 21, 2007

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SHAWN A. WILLIAMS
MONIQUE C. WINKLER
AELISH M. BAIG

22 /s/

23 MONIQUE C. WINKLER

24 100 Pine Street, Suite 2600
25 San Francisco, CA 94111
26 Telephone: 415/288-4545
27 415/288-4534 (fax)
28

1 LERACH COUGHLIN STOIA GELLER
2 RUDMAN & ROBBINS LLP
3 TRAVIS E. DOWNS III
4 BENNY C. GOODMAN III
5 655 West Broadway, Suite 1900
6 San Diego, CA 92101
7 Telephone: 619/231-1058
8 619/231-7423 (fax)

9 LERACH COUGHLIN STOIA GELLER
10 RUDMAN & ROBBINS LLP
11 THOMAS G. WILHELM
12 9601 Wilshire Blvd., Suite 510
13 Los Angeles, CA 90210
14 Telephone: 310/859-3100
15 310/278-2148 (fax)

16 SCHIFFRIN BARROWAY TOPAZ
17 & KESSLER, LLP
18 ERIC L. ZAGAR
19 ROBIN WINCHESTER
20 JAMES A. MARO
21 280 King of Prussia Road
22 Radnor, PA 19087
23 Telephone: 610/667-7706
24 610/667-7056 (fax)
25 ezagar@sbtclaw.com
26 rwinchester@sbtclaw.com
27 jmaro@sbtclaw.com

28 Co-Lead Counsel for Plaintiffs

I, MONIQUE C. WINKLER, am the ECF User whose ID and password are being used to
file this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45,
X.B., I hereby attest that JEFFREY S. FACTER has concurred in this filing.

DATED: March 21, 2007

SHEARMAN & STERLING LLP
JEFFREY S. FACTER
JUSTIN S. CHANG

/s/

JEFFREY S. FACTER

525 Market Street
San Francisco, CA 94105
Telephone: 415/616-1100
415/616-1199 (fax)

Counsel for Defendant Frank C. Lin

1 I, MONIQUE C. WINKLER, am the ECF User whose ID and password are being used to
2 file this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45,
3 X.B., I hereby attest that JIN H. KIM has concurred in this filing.

4 DATED: March 21, 2007

HOWARD RICE NEMEROVSKI CANADY
FALK & RABKIN, A Professional Corporation
SARAH A. GOOD
JIN H. KIM

/s/

JIN H. KIM

Three Embarcadero Center, Seventh Floor,
San Francisco, CA 94111-4024
Telephone: 415/434-1600
415/217-5910 (fax)

Counsel for Defendants Glen M. Antle, Jung-
Herng Chang, Peter Jen, Gerry Liu, John Luke,
Amir Mashkoori, Millard Phelps, and W. Stephen
Rowe and specially appearing for Yasushi
Chikagami

13 I, MONIQUE C. WINKLER, am the ECF User whose ID and password are being used to
14 file this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45,
15 X.B., I hereby attest that THOMAS G. ALLEN has concurred in this filing.

16 DATED: March 21, 2007

PILLSBURY WINTHROP SHAW
PITTMAN, LLP
CHARLES J. LANDY
THOMAS G. ALLEN

/s/

THOMAS G. ALLEN

2300 N Street, NW
Washington, DC 20037-1122
Telephone: 202/663-8000
202/663-8007 (fax)

PILLSBURY WINTHROP SHAW
PITTMAN, LLP
WALTER J. ROBINSON
2475 Hanover Street
Palo Alto, CA 94304-1114
Telephone: 650/233-4500
650/233-4545 (fax)

Counsel for Defendant John S. Edmunds

1 I, MONIQUE C. WINKLER, am the ECF User whose ID and password are being used to
2 file this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45,
3 X.B., I hereby attest that DAVID PRIEBE has concurred in this filing.

4 DATED: March 21, 2007

DLA PIPER RUDNICK GRAY CARY
DAVID PRIEBE

/s/

DAVID PRIEBE

2000 University Avenue
East Palo Alto, California 94303
Telephone: 650/833-2056
650/833-2001 (fax)

DLA PIPER RUDNICK GRAY CARY
SHIRLI FABBRI WEISS
DAVID F. GROSS
153 Townsend Street, Suite 800
San Francisco, CA 94107
Telephone: 415/836-2562
415/836-2501 (fax)

Counsel for Nominal Defendant Trident
Microsystems, Inc.

* * *

ORDER

IT IS SO ORDERED.

DATED: 3/22/07


THE HONORABLE JEREMY FOGEL
UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 21, 2007.

/s/

MONIQUE C. WINKLER

Lerach Coughlin Stoia Geller Rudman &
Robbins LLP
100 Pine Street, 26th Floor
San Francisco, CA 94111
Telephone: 415/288-4545
415/288-4534 (fax)
E-mail: moniquew@lerachlaw.com

Mailing Information for a Case 5:06-cv-03440-JF

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Thomas Grimes Allen**
Thomas.Allen@pillsburylaw.com
- **Justin S. Chang**
jchang@shearman.com
- **Jeffrey S. Facter**
jfactor@shearman.com rcheatham@shearman.com;jae.ko@shearman.com
- **Sarah A. Good**
sgood@howardrice.com b Hastings@howardrice.com
- **Robert S. Green**
RSG@CLASSCOUNSEL.COM CAND.USCOURTS@CLASSCOUNSEL.COM
- **Jin H. Kim**
jkim@hrice.com
- **Charles J. Landy**
charles.landy@pillsburylaw.com
- **James Arthur Maro**
jmaro@sbtclaw.com der_filings@sbtclaw.com
- **David Priebe**
david.priebe@dlapiper.com stacy.murray@dlapiper.com
- **Patrick David Robbins**
probbins@shearman.com
- **Clara Shin**
cshin@hrice.com ccamp@howardrice.com
- **Jason Takenouchi**
jtakenouchi@howardrice.com
- **Shawn A. Williams**
shawnw@lerachlaw.com
e_file_sd@lerachlaw.com;e_file_sf@lerachlaw.com;aelishb@lerachlaw.com;moniquew@lerachla
- **Eric L. Zagar**
ezagar@sbclasslaw.com rwinchester@sbclasslaw.com;der_filings@sbclasslaw.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)